

SDMS Document



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**26 NOV 1986**

CERTIFIED MAIL--  
RETURN RECEIPT REQUESTED

Thomas M. Armstrong  
Counsel, Corporate Environmental Programs  
General Electric Company  
3135 Easton Turnpike - W1A  
Fairfield, CT 06431

Re: SCP-Carlstadt

Dear Mr. Armstrong:

This is in response to your September 11, 1986 letter to Janet Feldstein of my staff, regarding EPA's comments on Dames & Moore's Draft Project Operations Plan ("POP"). As Janet told you when you spoke September 18, 1986, EPA feels that your letter requires some clarification.

First, you express concern about the seven day response time referred to in EPA's letter to William Ward, dated September 3, 1986. As you are aware, paragraph 26.B. of the Administrative Order on Consent (EPA Index No. II-CERCLA-50114), clearly sets forth the time frame for response to both EPA's initial comments and EPA's final comments. The Order allowed 5 business days from receipt of EPA's initial comments for the opportunity to meet with EPA to discuss such comments. However, at the Committee's request, EPA agreed to postpone the meeting because of difficulty in scheduling due to vacations, etc. Therefore, although EPA's initial comments were received by Mr. Ward on July 21, 1986, the meeting was not held until August 5, 1986. Subsequent to that meeting, EPA representatives held numerous telephone conferences with Mr. Ward and Gerard Coscia, of Dames & Moore, to further discuss the initial comments. When EPA sent out the final comments on September 3, 1986, both Mr. Ward and Mr. Coscia were fully aware that EPA expected to receive a revised POP within seven days of receipt of those final comments as required by paragraph 26.B. of the Order; both were also fully aware of the substance of those comments.

Second, you raised concerns regarding the substance of EPA's final comments. Specifically, you seem to object to EPA's

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recommendations for some additional soil and surface water sampling. You state that you interpret paragraph 26.B. of the Order to allow EPA to determine if the POP is "consistent with the Work Plan". However, paragraph 26.B. states:

"EPA will address its comments to the conformance of the Site Operations Plan with sound management, engineering and scientific practices; technological feasibility; established environmental monitoring procedures; and consistency with the Work Plan."

EPA feels that the additional work required falls into the categories described above. In addition, it is my understanding that although EPA's comments on the Draft Work Plan were incorporated in the October 1, 1985 revision, EPA never formally approved the latest draft. In addition, EPA feels that the additional work required by in our comments is necessary to accomplish the goals of the Remedial Investigation/Feasibility Study, as stated in the October 1, 1985 draft of the Work Plan.

The above issues notwithstanding, I feel it is necessary to mention a broader issue relative to the new Superfund law. As you may know, the Superfund Amendments and Reauthorization Act of 1986 (SARA) significantly changes the Agency's policies and procedures with respect to cleanup standards and selection of a remedy. These changes will apply to any site where a Record of Decision has not yet been signed. The Agency is currently assessing the impact of these changes on all ongoing projects, including both those being performed by the Agency and those being performed by Potentially Responsible Parties. You should be aware, however, that it is clear that additional work may be required during the Remedial Investigation/ Feasibility Study (RI/FS) stage. Further information on the impacts of SARA is forthcoming; we will be available to discuss this with you in greater detail in the near future.

I have attached EPA's comments on the latest draft of the POP. Once these comments have been addressed, either by an addendum or a revision to the plan, EPA will approve the POP and recommend a schedule for initiation of field activities.

If you would like to discuss these points further, please feel free to call me at (212) 264-2649 or Janet Feldstein at (212) 264-0613.

Sincerely yours,

John V. Czapor, Chief  
Site Compliance Branch

Attachment

cc: William P. Ward, General Motors Corp. (via Certified Mail)  
William Warren, Warren, Goldberg, et al.  
Christine Altomari, NJDEP  
Gerard Coscia, Dames & Moore

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cc: J. Rooney, ORC

Comments on September 18, 1986 Draft Project Operations Plan

Section

Figure 4-2 The project schedule indicates that the slug or injection tests will be performed before the samples are collected from the wells. These hydraulic tests should be performed after the samples are collected because the tests may require the addition of water to the wells wells, which might dilute the actual contaminant concentrations in the groundwater.

7.2.3 Personnel should upgrade to level C if any measureable levels above background are detected with PID or OVA. Level D+ (no respiratory protection) is not adequate.

7.6 The plan still does not reflect a refraction survey (see comments dated September 3, 1986 page 2).

7.9 NJDEP Division of Water Resources feels that the wells should be sampled fourteen days after their development, not five to ten days as stated on page 7-32.

7.10 Stream and Sediment Sampling Program:

As you were informed by EPA's original comments, dated July 15, 1986, Dames and Moore's stream sampling program is inadequate to determine the site's impact on Peach Island Creek and surrounding surface waters. The program proposed in the Draft POP should be enhanced to include, at a minimum, the following:

- a) a determination of the hydrological interconnection between the groundwater underlying the site and Peach Island Creek,
- b) a determination of the types of discharges which may be occurring;
- c) a determination of the presence of any off-site discharges which may affect the surface water quality in the vicinity of the site.

EPA's recommendation is that Dames & Moore's proposed program be expanded by adding another stream sampling location, bringing the total to four; the locations are marked on the attached map. Also, modifications to the timing of sample collection should be made so that the two rounds of samples will be collected at low tide, but one round will be collected immediately following a storm, while the other will be collected during a relatively dry period. EPA feels that one round of samples must be collected after a storm to enable Dames & Moore to determine whether surface runoff from the site is contributing to contamination of the Creek.

The collection of sediment samples should also be modified. Two rounds of sediment samples should be collected at each of the four surface water sample locations. Sampling should occur at the same time that surface water samples are being taken. In addition to the sediment samples which will be collected from the zero to two inch depth of the stream bed, a composite sediment sample should be collected from a depth of approximately six to twelve inches at each of the sediment sample locations.

7.10.5 Add the word "bottle" in Section 7.10.5.1 (1).

It still remains unclear that the preservative will be added after the samples are collected.

7.11 EPA believes that in order to properly characterize the site, and the risks associated with superficial soil contamination at the site, it is necessary to collect samples from the soils in the 0-1 ft. range. One shallow soil sample must be collected from this depth at each of the 17 locations. The samples which were to be collected at the 1-2 ft range should be collected at the 2-3 foot range.

Figure 7-2 Well construction

NJDEP has informed EPA that their permit specification for double cased wells include an 8 inch outer casing and riser pipe, not the 6 inch outer casing identified in this figure. Attached is the information NJDEP has provided to EPA regarding their well construction requirements.

NJDEP Division of Water Resources has asked that EPA relay the following information regarding the acceptable grouts:

- a) Cement and 5% Bentonite- max of 8 gals of potable water per 94 lb. bag of bentonite (5%)
- b) Cement and 10% Bentonite- max of 10 gals of potable water per 94 lb. bag of bentonite (10%)
- c) Neat Cement- max of 6 gals of potable water for 94 lb. bag of bentonite.

Table 10-3

The proper method for nickel is 249.2

The proper method for silver is 272.1. and

The proper method for thallium is 279.2.

Appendix A

Is page A-1 missing?

7A. Add "soil".

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7d. Add "Vol. 1-81" instead of "Vol. 1" in both locations.  
Table 4-2.

The parameter volatile organics must also have xylenes, styrene and NPE listed under it.

For alkalinity Method 310 must be specified as 310.1 or 310.2.

The SW-846 Methods must be listed by both work-up and analysis numbers.

The method to be used for petroleum hydrocarbons in soil is as follows: Prepare sample as per oil and grease method as found in "Procedures for Handling and Chemical Analysis of Sediment and Water Samples", EPA/CE-81-1, NTIS #AD-A193798, then follow EPA Method 418.1 starting with paragraph 7.7 (Note: add 3g silica gel for every 100 ml of final extract).

Methods for Chemical Analysis of Water and Wastes, 1983 should be referenced.

How will method 824 and the SW-846 method be modified for the analysis of BPE, styrene, and xylenes?

#### Appendix E Health and Safety Plan

Any subcontractors working at the site must either follow Dames & Moore's Health & Safety Plan, or one at least as stringent.

Page 4 - typographical error: lagoon or sludge pit in the northeast quadrant of the site.

In general, it does not appear that all of EPA's comments (see letters of July 16 and September 3, 1986) have been addressed, as was agreed at our August 5 meeting. Dames and Moore should review both the original and final comments and ensure that these are all addressed in a revision or addendum to this September 18, 1986 Draft POP.

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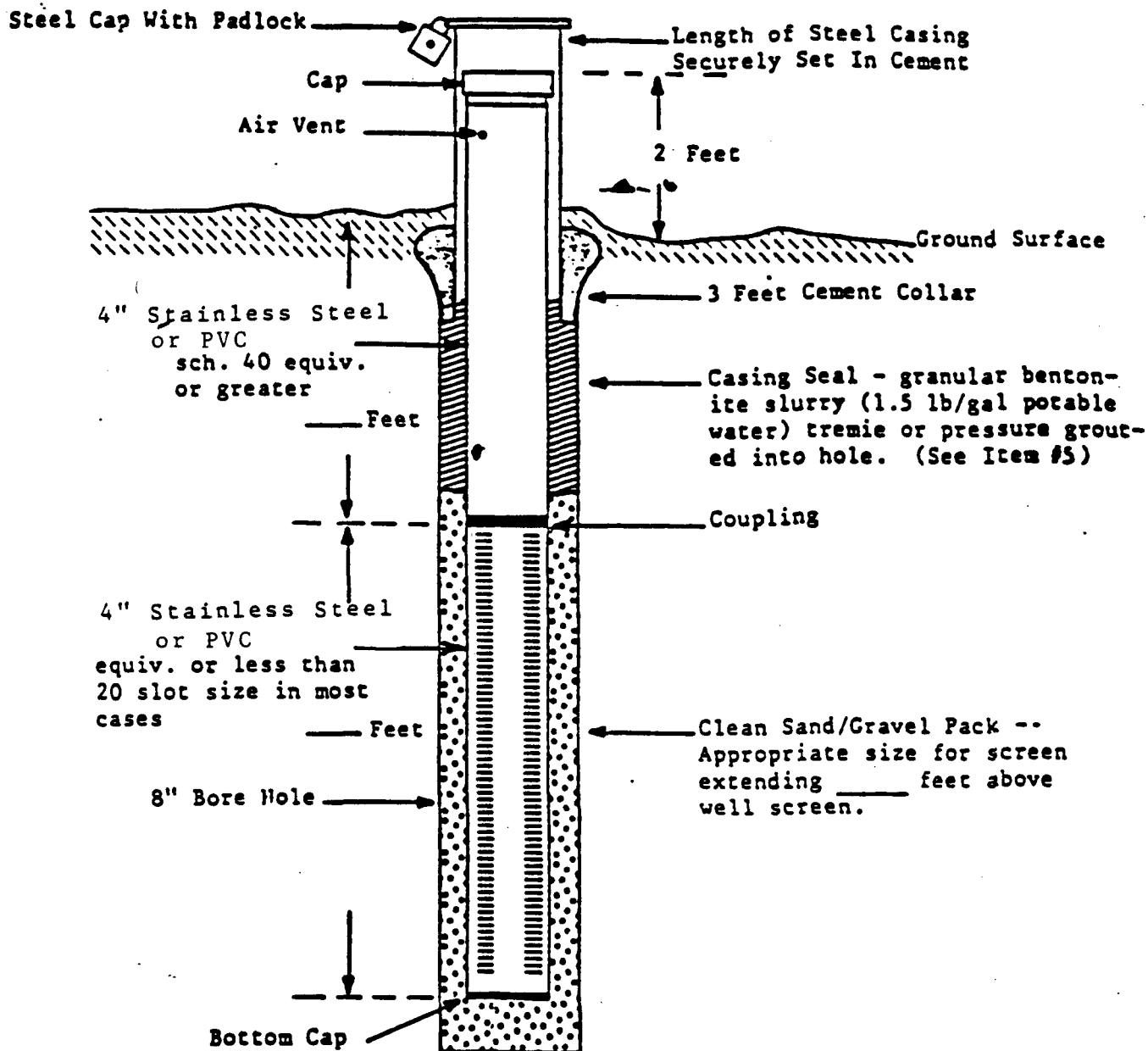
# New Jersey Department of Environmental Protection Unconsolidated Monitor Well Specifications\*

Site Name: \_\_\_\_\_

ATTACHMENT III-E

Location: \_\_\_\_\_

Date: \_\_\_\_\_



NOT TO SCALE

## REQUIREMENTS:

1. Notification to the NJDEP is required two (2) weeks prior to drilling.
2. State well permits are required for each monitor well constructed by the driller. Report "use of well" on well permit application. Permit number must be permanently affixed to each monitor well.

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3. The borehole must be a minimum of four (4) inches greater than the casing diameter.
4. Wells must be gravel packed unless noted otherwise in Additional Requirement #8.
5. Approved high grade sodium base, well sealant type, granular bentonite must be used to seal casing. Casing sealant and drilling fluids must be mixed with potable water.
6. All wells must be developed upon completion for a minimum of one (1) hour or to yield a turbid-free discharge.
7. The driller must maintain an accurate written log of all materials encountered in each hole, record all construction details for each well, the static water levels, and any tidal fluctuations (when applicable). This information must be submitted to the Office of Water Allocation as required by N.J.S.A. 58:4A.
8. If low level organic compounds are to be sampled for, only threaded or press joints (no glue joints) are acceptable.
9. A length of steel casing with a locking cap must be securely set in cement a minimum of three (3) feet below ground surface.
10. Top of the casing (excluding cap) must be surveyed to the nearest hundredth foot (0.01) by a licensed surveyor. The casing must be permanently marked at the point surveyed. The well(s) should be numbered clearly on the casing. A detailed site map with the well locations and casing elevations must be submitted to \_\_\_\_\_

11. NOTICE IS HEREBY GIVEN OF THE FOLLOWING:

- a. Review by the Department of well locations and depths is limited solely to review for compliance with the law and Department rules;
- b. The Department does not review well locations or depths to ascertain the presence of, nor the potential for, damage to any pipeline, cable or other structure;
- c. The permittee (applicant) is solely responsible for safety and adequacy of the design and construction of wells required to be constructed by the Department;
- d. The permittee (applicant) is solely responsible for any harm or damage to person or property which results from the construction or maintenance of any well; this provision is not intended to relieve third parties of any liabilities or responsibilities which are legally theirs.

ADDITIONAL REQUIREMENTS (IF CHECKED):

- ☐ 1. Top of screen set \_\_\_\_\_ feet above/below water table.
- ☐ 2. Split Spoon Samples \_\_\_\_\_
- ☐ 3. Dedicated Bailer (Sampler) In Well(s) \_\_\_\_\_
- ☐ 4. Threaded or Press Joints \_\_\_\_\_
- ☐ 5. Five (5) Foot Casing Tailpiece Below Screen \_\_\_\_\_
- ☐ 6. Centralizers On Screen \_\_\_\_\_
- ☐ 7. Borehole Geophysical Log(s) \_\_\_\_\_
- ☐ 8. Other \_\_\_\_\_

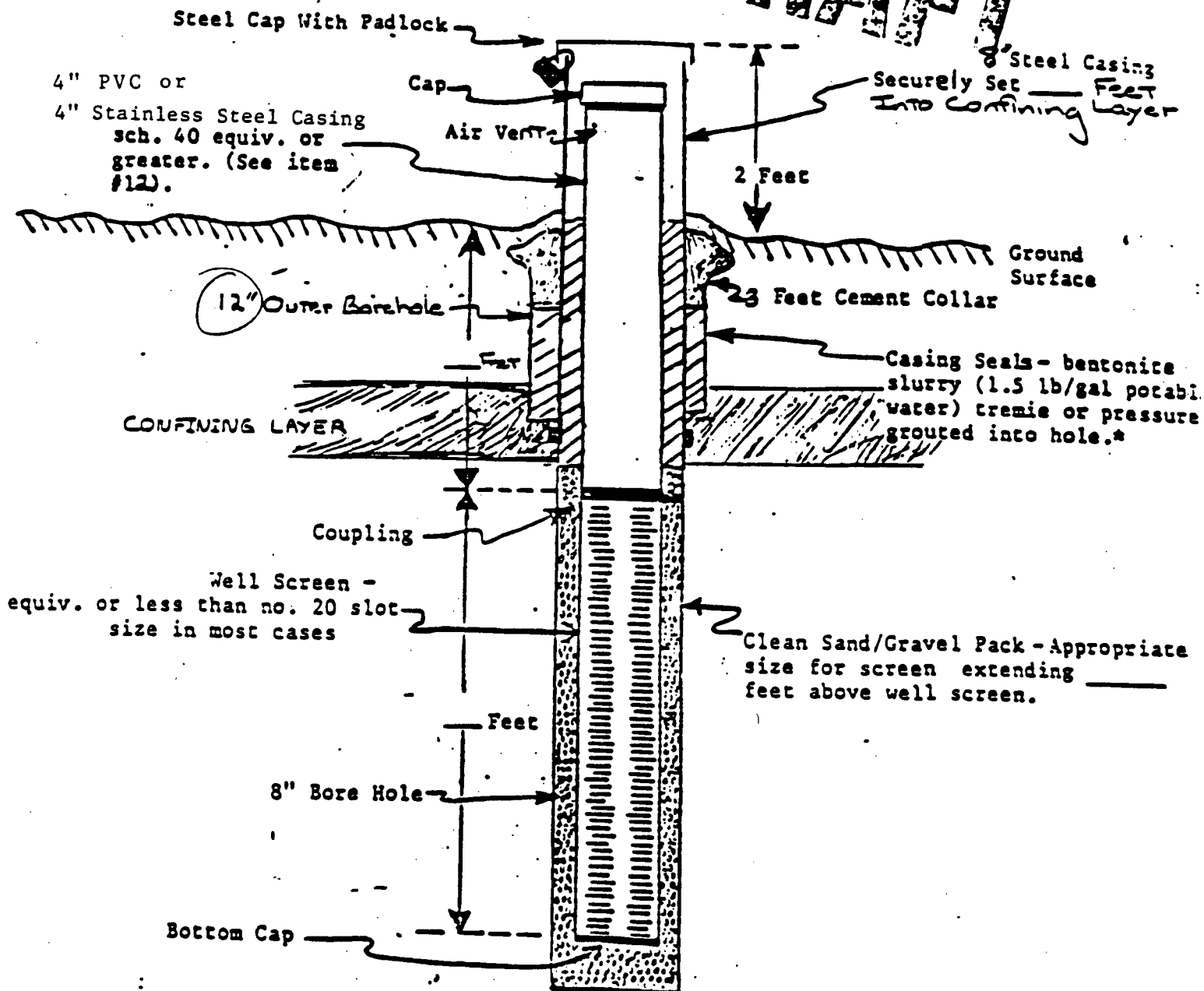
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\* OTHER MATERIALS, DESIGNS AND CASING DIAMETERS MAY BE USED WITH PRIOR APPROVAL BY THE NJDEP.

ATTACHMENT III  
NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION  
UNCONSOLIDATED MONITOR WELL SPECIFICATIONS FOR  
CONFINED AQUIFERS

SITE NAME: \_\_\_\_\_  
LOCATION: \_\_\_\_\_  
DATE: \_\_\_\_\_

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NOT TO SCALE

**REQUIREMENTS:**

- Notification to the NJDEP is required two (2) weeks prior to drilling



3. Outer casing casing must be securely set and grouted into the confining layer (depth field determined unless specified in diagram) before drilling continues through that layer.
4. Wells must be gravel packed (when necessary). Well sealant type, granular
- \* 5. Approved high grade sodium base bentonite must be used to seal casings. Casing solvent and
6. All wells must be developed upon completion for a minimum of one (1) hour to yield drilling fluids, in a turbid-free discharge. be mixed in
7. The driller must maintain an accurate written log of all materials encountered in each hole, record all construction details for each well, the static water levels, and any tidal fluctuations (when applicable). what?
8. If low level organic compounds are to be sampled for, only threaded or press joints (no glue joints) are acceptable.
9. Cement collar must be installed a minimum of one (1) hour after outer casing sealant has been employed.
10. Locking caps on outer casing must be provided to secure each well.
11. Top of the casing (excluding cap) must be surveyed to the nearest hundredth foot (0.01) by a licensed surveyor. The casing must be permanently marked at the point surveyed. The well(s) should be numbered clearly on the casing. A site map with the well locations and casing elevations must be submitted to NJ Geologic Sur
12. Other materials, designs and casing diameters may be used with prior approval by the NJDEP.
13. NOTICE IS HEREBY GIVEN OF THE FOLLOWING:

- a. Review by the department of well locations and depths is limited solely to review for compliance with the law and department rules;
- b. The department does not review well locations or depths to ascertain the presence of, nor the potential for, damage to any pipeline, cable or other structure;
- c. The permittee (applicant) is solely responsible for safety and adequacy of the design and construction of wells required to be constructed by the department;
- d. The permittee (applicant) is solely responsible for any harm or damage to person or property which results from the construction or maintenance of any well; this provision is not intended to relieve third parties of any liabilities or responsibilities which are legally theirs.

**ADDITIONAL REQUIREMENTS (IF CHECKED):**

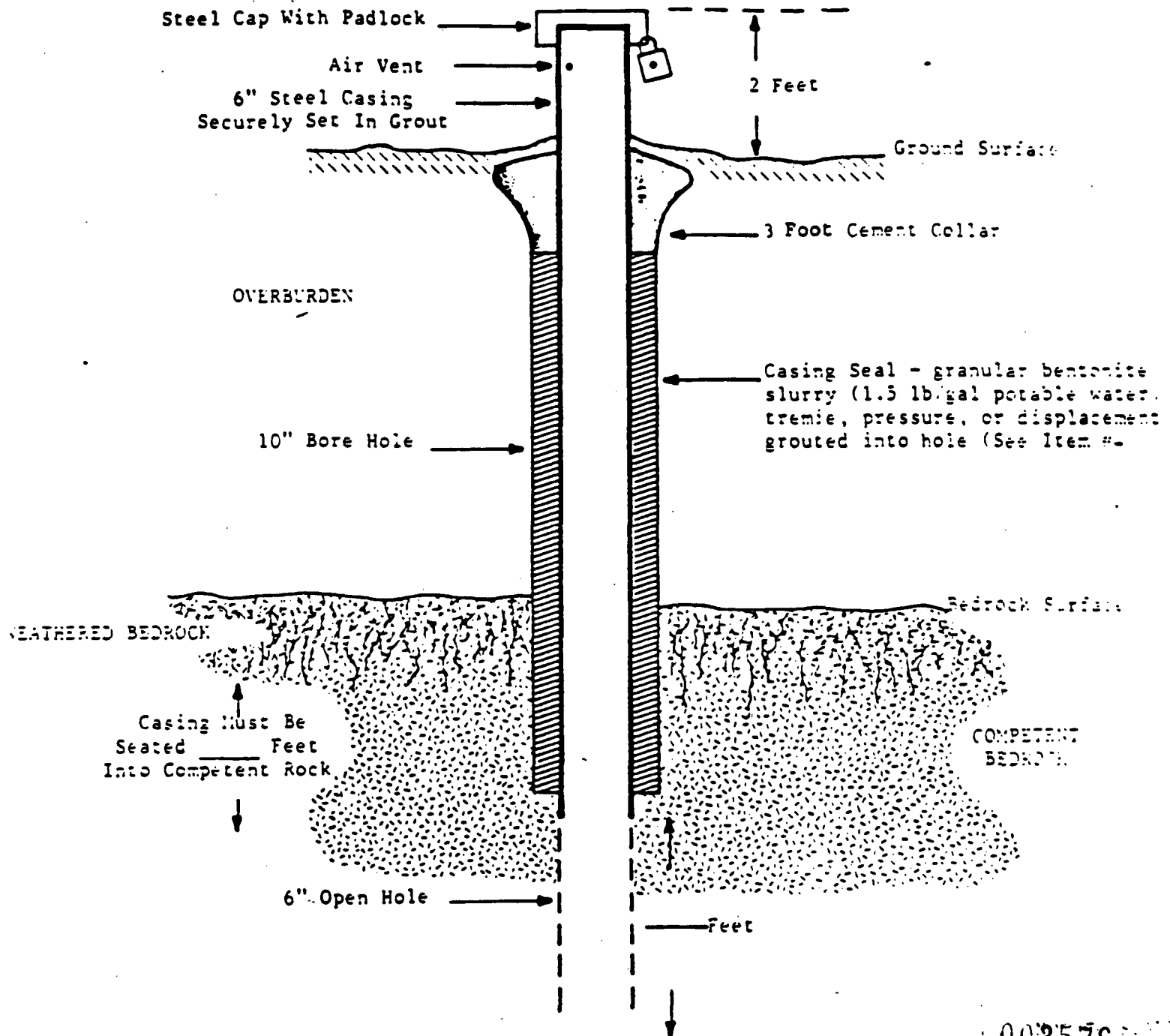
1. ☐ Top of screen set \_\_\_\_\_ feet above/below water table.
2. ☒ Split Spoon Samples \_\_\_\_\_ at every 5 ft. or change in lithology
3. ☐ Dedicated Bailer (Sampler) In Well(s) \_\_\_\_\_
4. ☒ Threaded or Press Joints \_\_\_\_\_ NO glued joints!
5. ☐ Five (5) Foot Casing Tailpiece Below Screen \_\_\_\_\_
6. ☐ Centralizers On Screen \_\_\_\_\_
7. ☐ Borehole Geophysical Log(s) \_\_\_\_\_
8. ☐ Other \_\_\_\_\_

# New Jersey Department of Environmental Protection Rock Monitor Well Specifications\*

Site Name: \_\_\_\_\_

Location: \_\_\_\_\_

Date: \_\_\_\_\_



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## REQUIREMENTS:

1. Notification to the NJDEP is required two (2) weeks prior to drilling.
2. State well permits are required for each monitor well constructed by the driller. Report "use of well" on well permit application. Permit number must be permanently affixed to each monitor well.

3. Oversize borehole, minimum four (4) inches greater than casing diameter drilled through overburden and casing sealed ten (10) feet into competent rock unless shown otherwise above.
4. Approved high grade sodium base, well sealant type, granular bentonite must be used to seal casing. Casing sealant and drilling fluids must be mixed with potable water.
5. Well must be developed upon completion for a minimum of one (1) hour or to yield a turbid-free discharge.
6. The driller must maintain an accurate written log of all materials encountered in each hole, record all construction details for each well, and record the depth of major water bearing fracture zones. This information must be submitted to the Office of Water Allocation as required by N.J.S.A. 58:4A.
7. Cement collar must be installed a minimum of one (1) hour after casing seal has been emplaced.
8. Locking caps must be provided to secure each well.
9. Top of each well casing (excluding cap) must be surveyed to the nearest hundredth foot (0.01) by a licensed surveyor. The casing must be permanently marked at the point surveyed. The well should be numbered clearly on the casing. A detailed site map with well locations and casing elevations must be submitted to \_\_\_\_\_

10. NOTICE IS HEREBY GIVEN OF THE FOLLOWING:

- a. Review by the Department of well locations and depths is limited solely to review for compliance with the law and Department rules;
- b. The Department does not review well locations or depths to ascertain the presence of, nor the potential for, damage to any pipeline, cable or other structures;
- c. The permittee (applicant) is solely responsible for safety and adequacy of the design and construction of well required to be constructed by the Department;
- d. The permittee (applicant) is solely responsible for any harm or damage to person or property which results from the construction or maintenance of any well; this provision is not intended to relieve third parties of any liabilities or responsibilities which are legally theirs.

ADDITIONAL REQUIREMENTS (IF CHECKED):

- ☒ 1. Split Spoon Samples (In Overburden) AS REQUIRED IN SCOPE OF WORK
- ☒ 2. Rock Core Samples OPTIONAL
- ☒ 3. Dedicated Bailer (Sampler) in Well(s) OPTIONAL
- ☐ 4. Borehole Geophysical Log(s) \_\_\_\_\_
- ☒ 5. Other DRILLER MUST BE LICENSED AS PER NJSA 58:4A et seq

\* OTHER DRILLING METHODS, MATERIALS, DESIGNS AND CASING DIAMETERS MAY 003577 WITH PRIOR APPROVAL BY NJDEP.